

# State of Utah

## DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

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### Title V Operating Permit

**PERMIT NUMBER: 4900093001**

**DATE OF PERMIT: March 15, 2000**

Date of Last Revision: March 15, 2000

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This Operating Permit is issued to, and applies to the following:

**Name of Permittee:**

Western Pipe Coaters and Engineers  
P.O. Box 157  
Orem, UT 84057

**Permitted Location:**

Western Pipe Coaters and Engineers  
1625 N Cannon Place  
Vineyard, UT 84057

**UTM coordinates:** 4,464,075 meters Northing, 436,130 meters Easting

**SIC code:** 3479

### ABSTRACT

Western Pipe Coaters and Engineers, Inc is a steel pipe coating facility in Utah County, a non-attainment area for the National Ambient Air Quality Standard for PM<sub>10</sub> and Carbon Monoxide. The steel pipes are cleaned by shot blasting, coated with Polyken, and quenched with water spray. This source was constructed before 1969 and is grandfathered from NSR requirements. They are a major source of toluene.

### UTAH AIR QUALITY BOARD

By:

Prepared By:

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Ursula Kramer, Executive Secretary

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Jennifer He

### Operating Permit History

3/15/2000 - Permit issued	Action initiated by an initial operating permit application	
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**Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.**

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

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**Section I: GENERAL PROVISIONS**

**I.A. Federal Enforcement.**

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

**I.B. Permitted Activity(ies).**

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

**I.C. Duty to Comply.**

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records

required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

- I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

**I.D. Permit Expiration and Renewal.**

- I.D.1 **This permit is issued for a fixed term of five years and expires on March 15, 2005.** (R307-415-6a(2))

- I.D.2 Application for renewal of this permit is due by September 15, 2004. An application may be submitted early for any reason. (R307-415-5a(1)(c))

- I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

- I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

**I.E. Application Shield.**

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

**I.F. Severability.**

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

**I.G. Permit Fee.**

- I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

**I.H. No Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privilege.  
(R307-415-6a(6)(d))

**I.I. Revision Exception.**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

**I.J. Inspection and Entry.**

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit.  
(R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit.  
(R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

**I.K. Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

**I.L. Compliance Certification.**

- I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than March 14, 2001 and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))
- I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;
- I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;
- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
EPA, Region VIII  
999 18th Street, Suite 500  
Denver, CO 80202-2466

**I.M. Permit Shield.**

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))

- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))
- I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))
- I.N. **Emergency Provision.**
- I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))
- I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))
- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))



- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))
- I.O. **Operational Flexibility.**
- Operational flexibility is governed by R307-415-7d(1).
- I.P. **Off-permit Changes.**
- Off-permit changes are governed by R307-415-7d(2).
- I.Q. **Administrative Permit Amendments.**
- Administrative permit amendments are governed by R307-415-7e.
- I.R. **Permit Modifications.**
- Permit modifications are governed by R307-415-7f.
- I.S. **Records and Reporting.**
- I.S.1 Records.
- I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))
- I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))
- I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.
- I.S.1.b.2 The date analyses were performed.
- I.S.1.b.3 The company or entity that performed the analyses.
- I.S.1.b.4 The analytical techniques or methods used.
- I.S.1.b.5 The results of such analyses.

- I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.
- I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.
- I.S.2 Reports.
- I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))
- I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))
- I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 7 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))
- I.S.3 Notification Addresses.
- I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:
- Utah Division of Air Quality  
P.O. Box 144820  
Salt Lake City, UT 84114-4820  
Phone: 801-536-4000
- I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and  
Environmental Justice (mail code 8ENF)  
999 18th Street, Suite 500  
Denver, CO 80202-2466

For reports, notifications, or other correspondence  
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII  
Office of Partnerships & Regulatory Assistance  
Air & Radiation Program (mail code 8P-AR)  
999 18th Street, Suite 500  
Denver, CO 80202-2466  
Phone: 303-312-6440

**I.T. Reopening for Cause.**

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

**I.U. Inventory Requirements.**

I.U.1 An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.U.2 A Hazardous Air Pollutant Inventory shall be submitted in accordance with the procedures of R307-155, Hazardous Air Pollutant Inventory. (R307-155)

## **Section II: SPECIAL PROVISIONS**

### **II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.**

(R307-415-4(3)(a) and R307-415-4(4))

#### **II.A.1 Shot Blasting** (designated as Emission unit #1)

Unit Description: Cleaning incoming welded steel pipes before coating. Emission is controlled by a baghouse.

#### **II.A.2 Preheater Oven** (designated as Emission unit #2)

Unit Description: Natural gas fired preheat oven to heat the clean pipe before coating is applied. No unit-specific applicable requirements.

#### **II.A.3 Spray Booth** (designated as Emission unit #3)

Unit Description: Polyken tape or coal tar enamel coating is applied onto the hot pipes using a spray gun or swabs. The coated pipes are then quenched with water sprays. Emissions are drawn through a series of particulate-impinging baffles (3,500 ACFM) to a stack.

#### **II.A.4 Sand Blasting Equipment** (designated as Emission unit #4)

Unit Description: Equipment used for preparing metal surfaces prior to coating. Does not include shot blasting equipment.

### **II.B. Requirements and limitations.**

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

#### **II.B.1 Conditions on permitted source (Source-wide):**

**II.B.1.a** Visible emissions caused by fugitive dust shall not exceed 10% at the property boundary, and 20% onsite except during periods when wind speeds exceed 25 miles per hour and control measures in the most recently approved fugitive dust control plan are being taken. [Authority granted under R307-309-3(1) & R307-309-4(3); condition originated in R307-309-3(1) & R307-309-4(3)]

**II.B.1.a.1                      Monitoring:** In lieu of monitoring via visible emissions observations, adherence to the most recently approved fugitive dust control plan shall be monitored to demonstrate that appropriate measures are being implemented to control fugitive dust.

**II.B.1.a.2                      Recordkeeping:** Records of measures taken to control fugitive dust shall be maintained to demonstrate adherence to the most recently approved fugitive dust control plan. If wind speeds are measured to establish an exception from the above visible emissions limits, records of those measurements shall be maintained. Records shall be maintained as described in Provision I.S.1 of this permit.

**II.B.1.a.3                      Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

#### **II.B.2 Conditions on Shot Blasting (Emission unit #1):**

**II.B.2.a** Visible emissions shall be no greater than 20 percent opacity from baghouse. [Authority granted under R307-305-1(1); condition originated in R307-305-1(1)]

- II.B.2.a.1                      **Monitoring:**                      A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than steam are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9.
- II.B.2.a.2                      **Recordkeeping:**                      A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 shall also be maintained in accordance with Provision I.S.1 of this permit.
- II.B.2.a.3                      **Reporting:**                      There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.3                      **Conditions on Preheater Oven (Emission unit #2):**
- II.B.3.a                      Visible emissions shall be no greater than 20 percent opacity. [Authority granted under R307-305-1(1); condition originated in R307-305-1(1)]
- II.B.3.a.1                      **Monitoring:**                      In lieu of monitoring via visible emission observations, fuel usage shall be monitored to demonstrate that only natural gas is used as fuel.
- II.B.3.a.2                      **Recordkeeping:**                      Records such as gas bills, and gas meter readings shall be used to demonstrate natural gas usage. Records shall be maintained as described in Provision I.S of this permit.
- II.B.3.a.3                      **Reporting:**                      There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.4                      **Conditions on Spray Booth (Emission unit #3):**
- II.B.4.a                      Visible emissions shall be no greater than 20 percent opacity from stack. [Authority granted under R307-305-1(1); condition originated in R307-305-1(1)]
- II.B.4.a.1                      **Monitoring:**                      A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than steam are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9.
- II.B.4.a.2                      **Recordkeeping:**                      A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.4.a.3                      **Reporting:**                      There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5                      **Conditions on Sand Blasting Equipment (Emission unit #4):**

II.B.5.a                      Visible emissions shall not exceed 40 percent opacity for more than three minutes in any one hour if the permittee is complying with one of the performance standards listed below. If the permittee is not complying with one of the performance standards listed below, visible emissions shall not exceed 20 percent opacity for more than three minutes in any one hour.

- (a) Any abrasive blasting operation may use at least one of the following performance standards:
  - (1) Confined blasting;
  - (2) Wet abrasive blasting;
  - (3) Hydroblasting; or
  - (4) Unconfined blasting using abrasives as defined in paragraph (b).
- (b) Abrasives used for dry unconfined blasting referenced in paragraph (a)(4) above shall comply with the following performance standards:
  - (1) Before blasting the abrasive shall not contain more than 1% by weight material passing a #70 U.S. Standard sieve.
  - (2) After blasting the abrasive shall not contain more than 1.8% by weight material 5 micron or smaller.
  - (3) Abrasives reused for dry unconfined blasting are exempt from paragraph (b)(2), but must conform with paragraph (b)(1).
- (c) Sources using the performance standard of paragraph (a)(4) must demonstrate that the abrasives were obtained from persons that have certified (submitted test results) to the executive secretary at least annually that such abrasives meet the requirements of paragraph (b) above (ref. R307-206.).  
[Authority granted under R307-206; condition originated in R307--206]

II.B.5.a.1                      **Monitoring:**                      Visible emission evaluation of abrasive blasting operations shall be conducted at least once each month in accordance with the following provisions:

- (a) EPA proposed method 203B shall be used for all observations;
- (b) Evaluations shall be conducted by a person certified in accordance with 40 CFR 60, Appendix A, Method 9;
- (c) Observations shall be conducted for a period of no less than three minutes but no more than one hour, in accordance with the applicable time period for this provision;
- (d) Emissions from unconfined blasting shall be read at the densest point of the emission after a major portion of the spent abrasive has fallen out, at a point not less than five feet nor more than twenty-five feet from the impact surface from any single abrasive blasting nozzle;
- (e) Emissions from unconfined blasting employing multiple nozzles shall be judged as a single source unless it can be demonstrated by the owner or

operator that each nozzle, evaluated separately, meets the emission and performance standards of this provision;

(f) Emissions from confined blasting shall be read at the densest point after the air contaminant leaves the enclosure.

II.B.5.a.2                      **Recordkeeping:**      Records shall be maintained including the following information:

(1) Date and duration of abrasive blasting, and

(2) Results of visible emissions evaluations, and

(3) Documentation of adherence to any of the performance standards in paragraphs (a)(1)-(a)(4) of the above provision, if used.

II.B.5.a.3                      **Reporting:**              There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C.                      **Emissions Trading.** (R307-415-6a(10))  
Not applicable to this source.

II.D.                      **Alternative Operating Scenarios.** (R307-415-6a(9))  
Not applicable to this source.

### **Section III: PERMIT SHIELD**

III.A.                      A permit shield was not granted for any specific requirements.

### **Section IV: ACID RAIN PROVISIONS.**

IV.A.                      This source is not subject to Title IV. This section is not applicable.

## REVIEWER COMMENTS

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This operating permit incorporates all applicable requirements contained in the following documents:

BAQE-122-88      dated      April 08, 1988

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**1:      Comment on an item originating in BAQE-122-88 regarding permitted source (Source-wide):**

BAQE-122-88: The Approval Order (AO) was issued based on the NOI dated 11/30/87, which was submitted in response to a NOV issued for exceedance of the 20% opacity limitation during coal tar enamel coating operations. After the NOI was submitted, the oil content in the coal tar enamel was reportedly lowered so that the 20% opacity limitation had not been exceeded, negating the need for the scrubbing system. The scrubbing system was never installed. The AO has subsequently been voided and withdrew. There is no relevant AO conditions to include in the permit. Therefore, this source is still grandfather from NSR requirement. All condition in this AO will not be incorporated into this permit [Comment last updated on 1/24/2000]